

**NIXON
PEABODY**

RECEIVED

2016 DEC -5 PM 1:58

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

NIXON PEABODY LLP
ATTORNEYS AT LAW

NIXONPEABODY.COM
@NIXONPEABODYLLP

Eric C. Jeffrey
Counsel
ejeffery@nixonpeabody.com

Nixon Peabody LLP
799 9th Street NW
Suite 500
Washington, DC 20001-4501
202-585-8000

November 23, 2016

VIA FIRST CLASS MAIL

Ms. Rachel Dickon
Assistant Secretary of Federal Maritime Commission
800 North Capitol St.
Room 1046
Washington, D.C. 20573

Re: Docket No. 15-11 – Ovchinnikov v. Hitrinov

Dear Ms. Dickon:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1. Joint Motion for Extension of Time Regarding Motion to Withdraw

If you have any questions, please do not hesitate to contact me.

Best regards,

Eric Jeffrey

Enclosures

RECEIVED

23 NOV 2016 PM 1:58

OFFICE OF THE SECRETARY
FEDERAL MARITIME COMMISSION

FEDERAL MARITIME COMMISSION

WASHINGTON, D.C.

DOCKET NO. 15-11

IGOR OVCHINNIKOV, ET AL

v.

MICHAEL HITRINOV ET AL

Consolidated With

DOCKET NO. 1953(I)

KAIRAT NURGAZINOV, ET AL

v.

MICHAEL HITRINOV ET AL

**JOINT MOTION FOR EXTENSION OF TIME
REGARDING MOTION TO WITHDRAW**

Respondents Empire United Lines Co., Inc. and Michael Hitrinov, together with Eric Jeffrey and Nixon Peabody, hereby move for an extension of time until January 15, 2017 of the due date for Empire and Mr. Hitrinov's response to Mr. Jeffrey's motion to withdraw, and for waiver of the requirement to file motions for enlargement seven days prior to the due date. 46 C.F.R. 502.102(a). The good cause for both requests is as follows:

1. The motion to withdraw was filed and served on November 16. Mr. Jeffrey and Mr. Hitrinov have since had extensive discussions regarding resolution of their differences, so that Mr. Jeffrey and Nixon Peabody may continue representing Empire and Mr. Hitrinov in this proceeding. We have made some progress, but

cc: OS
OCC
BJS
Rus

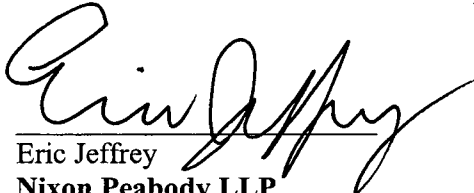


ORIGINAL

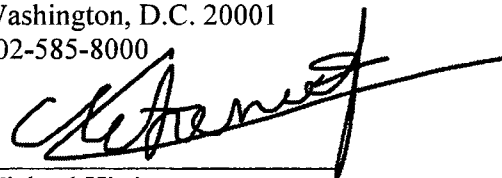
additional time is required, especially given the imminent holidays and the travel schedules of Mr. Jeffrey and Mr. Hitrinov.

2. Given that the response time for the motion to withdraw was only seven days, it was virtually impossible to move for extension seven days in advance of the due date. In any event, we were not then sufficiently advanced in our discussions to make such a motion, especially as Mr. Jeffrey was out of town on business from shortly after the motion was filed until Friday, November 18.
3. It is recognized by movants that resolution of the underlying motion to withdraw is necessary before Mr. Jeffrey and Nixon Peabody may resume substantive work on this proceeding, especially in light of Mr. Jeffrey's and Mr. Hitrinov's respective travel schedules, which will make coordination on any such matters next to impossible. Accordingly, each of Movants reserves the right to re-open the question of withdrawal and/or move for a stay, if such work becomes necessary.

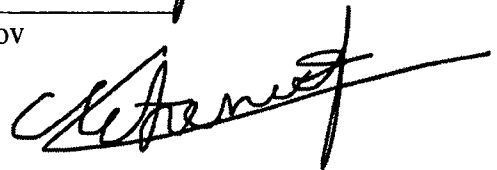
Respectfully submitted,



Eric Jeffrey
Nixon Peabody LLP
799 9th Street, N.W., Suite 500
Washington, D.C. 20001
202-585-8000



Michael Hitrinov
Respondent



Empire United Lines Co., Inc.
Respondent

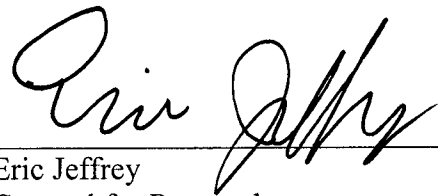
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Joint Motion for Extension of Time Regarding Motion to Withdraw by first class mail to the following:

Marcus A. Nussbaum, Esq.
P.O. Box 245599
Brooklyn, NY 11224

Seth M. Katz, Esq.
P.O. Box 245599
Brooklyn, NY 11224

Date: November 23, 2016

A handwritten signature in black ink, appearing to read "Eric Jeffrey", is written over a horizontal line.

Eric Jeffrey
Counsel for Respondents